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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

DANCO, INC., a Delaware corporation,

Plaintiff,

v.

FLUIDMASTER, INC., a California
corporation,

Defendant.

Case No. 8:23-cv-01156-AB-DFM

JOINT STIPULATION REGARDING
FILING OF AMENDED PLEADINGS

1 Plaintiff Danco, Inc. (“Danco”) and Defendant Fluidmaster, Inc. (“Fluidmaster”)
2 (collectively, the “Parties”; each individually, a “Party”), by and through their
3 undersigned counsel, hereby stipulate as follows and respectfully request the Court
4 enter the proposed order filed herewith.

5 WHEREAS, Danco filed its original complaint in this action on June 28, 2023;

6 WHEREAS, the deadline for Fluidmaster to answer or otherwise respond to the
7 complaint is currently September 26, 2023;

8 WHEREAS, the Parties conferred and Danco has agreed to file an amended
9 complaint attaching exhibits that were inadvertently omitted from the original
10 complaint;

11 WHEREAS, Danco has agreed to file its first amended complaint on or before
12 October 2, 2023;

13 WHEREAS, the Parties conferred and agreed that Fluidmaster shall file its
14 answer or otherwise respond to Danco’s first amended complaint on or before
15 November 15, 2023;

16 NOW THEREFORE, the Parties hereby STIPULATE as follows:

17 1. Danco shall file its first amended complaint on or before October 2, 2023;

18 and

19 2. Fluidmaster shall answer or otherwise respond to Danco’s first amended
20 complaint on or before November 15, 2023.

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1 BASED ON THE FOREGOING STIPULATION, the Parties respectfully
2 request that the Court adopt the proposed order submitted herewith, making the
3 foregoing stipulation an order of the Court.

4
5 Dated: September 26, 2023

THOMAS | HORSTMAYER LLP

6
7 By: /s/ Eric G. Maurer
Eric G. Maurer (GA Bar # 478199)
8 (pro hac vice)
Cynthia J. Lee (GA Bar # 442999)
9 (pro hac vice)

10 J. MARK HOLLAND & ASSOCIATES
11 J. Mark Holland (CA Bar No. 140453)

12 *Attorneys for Plaintiff Danco, Inc.*

13 Dated: September 26, 2023

14 PILLSBURY WINTHROP SHAW PITTMAN,
15 LLP

16 By: /s/ Ranjini Acharya
MARK D. LITVACK
17 CAROLYN S. TOTO
RANJINI ACHARYA

18 *Attorneys for Defendant Fluidmaster, Inc.*

19 **FILER'S ATTESTATION**

20 Pursuant to Civil L.R. 5-4.3.4(a)(2) regarding signatures, I attest under penalty
21 of perjury that concurrence in the filing of this document has been obtained.
22

23 /s/ Ranjini Acharya
24 Ranjini Acharya
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